

# EXHIBIT E

## Jason Mizrahi

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**From:** Jason Mizrahi  
**Sent:** Monday, March 16, 2020 10:52 AM  
**To:** Louis Leon; Joshua Levin-Epstein  
**Subject:** RE: Chinch v. Patel [17-cv-06127] - Notice of Deposition - FOURTH REQUEST

**Categories:** Patel. Manojkumar

Louis,

We can make ourselves available any day for the remainder of March.

Please let me know what day / time works best for you.

Thank,  
Jason

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Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Ave., Suite 2525  
New York, NY 10170  
Phone: (212) 792-0048  
Mobile: (301) 758-7351  
Facsimile: (646) 786-3170  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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**From:** Louis Leon <lleon@cafaro.esq.com>  
**Sent:** Wednesday, March 11, 2020 3:11 PM  
**To:** Jason Mizrahi <Jason@levinepstein.com>; Joshua Levin-Epstein <Joshua@levinepstein.com>  
**Subject:** RE: Chinch v. Patel [17-cv-06127] - Notice of Deposition - FOURTH REQUEST

Jason:

As I noted in my letter submission to the Court and during yesterday's phone conference, nothing through the 20<sup>th</sup> works for us. Please propose some dates for the remainder of March.

Sincerely,  
Louis M. Leon, Esq.  
Associate



108 West 39<sup>th</sup> Street, Suite 602  
New York, NY 10018  
Main (212) 583-7400  
Fax. (212) 583-7401  
[LLeon@CafaroEsq.com](mailto:LLeon@CafaroEsq.com)

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**From:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Sent:** Wednesday, March 11, 2020 11:34 AM  
**To:** Louis Leon <[lleon@cafaroesq.com](mailto:lleon@cafaroesq.com)>; Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Chincha v. Patel [17-cv-06127] - Notice of Deposition - FOURTH REQUEST

Louis,

How is 3/18?

Jason

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Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Ave., Suite 2525  
New York, NY 10170  
Phone: (212) 792-0048  
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**From:** Louis Leon <[lleon@cafaroesq.com](mailto:lleon@cafaroesq.com)>  
**Sent:** Wednesday, March 11, 2020 11:26 AM  
**To:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Cc:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** Re: Chincha v. Patel [17-cv-06127] - Notice of Deposition - FOURTH REQUEST

Josh:

Please provide me with your and your client's availability to discuss with Plaintiff.

Also, just as a correction, the subject line of your emails are misleading. You have not made four requests to schedule my client's deposition.

Sincerely,  
Louis M. Leon  
Sent from my iPhone

On Mar 11, 2020, at 9:41 AM, Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)> wrote:

Louis,

What dates are you available? We are trying to work with you here.

Please advise by COB today.

Thank you.

Regards,

Josh

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Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

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**From:** Joshua Levin-Epstein  
**Sent:** Tuesday, March 10, 2020 11:08 AM  
**To:** Louis Leon <[lleon@cafaroeseq.com](mailto:lleon@cafaroeseq.com)>  
**Cc:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** RE: Chinch v. Patel [17-cv-06127] - Notice of Deposition - THIRD REQUEST  
**Importance:** High

Louis,

What dates are you available? We are trying to work with you here.

Please advise by COB today.

Thank you.

Regards,

Josh

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Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
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**From:** Joshua Levin-Epstein  
**Sent:** Friday, March 06, 2020 10:49 AM  
**To:** Louis Leon <[lleon@cafaroeseq.com](mailto:lleon@cafaroeseq.com)>  
**Cc:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** RE: Chinch v. Patel [17-cv-06127] - Notice of Deposition

Louis,

What dates are you available? We are trying to work with you here.

Please advise by COB today.

Thank you.

Regards,

Josh

---

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
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Phone: (212) 792-0046  
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**From:** Louis Leon [<mailto:lleon@cafaroescq.com>]  
**Sent:** Friday, March 06, 2020 10:25 AM  
**To:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Chinch v. Patel [17-cv-06127] - Notice of Deposition

Jason:

I didn't receive your email "re-noticing" Plaintiff's deposition. Please be advised that **we are not** available on March 9, 2020. Thank you.

**Sincerely,**  
**Louis M. Leon, Esq.**  
**Associate**  
<image001.jpg>  
108 West 39<sup>th</sup> Street, Suite 602  
New York, NY 10018  
Main (212) 583-7400  
Fax. (212) 583-7401  
[LLeon@CafaroEsq.com](mailto:LLeon@CafaroEsq.com)

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**From:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Sent:** Thursday, March 5, 2020 6:37 PM  
**To:** Louis Leon <[lleon@cafaroescq.com](mailto:lleon@cafaroescq.com)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Chinch v. Patel [17-cv-06127] - Notice of Deposition

Louis,

Please confirm your attendance on Monday. Please confirm your client's attendance. Please let me know if your client requires an interpreter.

Thank you  
Jason

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Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Ave., Suite 2525  
New York, NY 10170  
Phone: (212) 792-0048  
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**From:** Jason Mizrahi

**Sent:** Monday, February 24, 2020 1:24 PM

**To:** Louis Leon <[lleon@cafaroessq.com](mailto:lleon@cafaroessq.com)>

**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>

**Subject:** Chinch v. Patel [17-cv-06127] - Notice of Deposition

Louis,

Please be advised that we are hereby re-noticing your client's deposition for **Monday, March 9, 2020** beginning at 10:00 a.m. at our offices,

Levin-Epstein & Associates, P.C.  
420 Lexington Ave., Suite 2525  
New York, NY 10170

Thank you,

Jason

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Jason Mizrahi, Esq.

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New York, NY 10170

Phone: (212) 792-0048

Mobile: (301) 758-7351

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